

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE**

IN RE:	)	
	)	Case No. _____
RICHARD STEPHEN POTTS,	)	
	)	
Debtor.	)	
	)	
	)	
RICHARD POTTS,	)	Adv. Proc. No. _____
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
TREY CAIN and RIVER EDGE INN, LLC,	)	
	)	
Defendants.	)	
	)	

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. § 1452 and Federal Rule of Bankruptcy Procedure 9027, Trey Cain and River Edge Inn, LLC hereby give notice of removal of the action styled *Richard Potts v. Trey Cain, et. al*, Sevier County Chancery Court Case No. 19-10-203 (the “State Court Action”). Mr. Cain and River Edge Inn, LLC state as follows:

1. On October 11, 2019, Mr. Potts initiated the State Court Action.
2. On March 4, 2020, Mr. Cain and River Edge Inn, LLC asserted counterclaims in the State Court Action.
3. On March 17, 2020, Mr. Potts filed for bankruptcy under Chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Middle District of Tennessee, case number 3:20-BK-01689 (the “Bankruptcy Proceeding”).
4. Pursuant to 28 U.S.C. § 1334(b), this Court has jurisdiction over the State Court Action because the claims and counterclaims arise under, arise in, or are related to the Bankruptcy

Proceeding. Without limitation, Plaintiff's claims in the State Court Action concern whether he has an ownership interest in River Edge (which is denied, but if correct would be property of the bankruptcy estate), and Defendant's counterclaims are stayed pursuant to the automatic stay and concern issues of fraud and other non-dischargability issues against Plaintiff.

Pursuant to Rule 9027, a copy of all process and pleadings in the State Court Action are attached hereto. Mr. Cain and River Edge Inn, LLC consent to entry of final orders and judgment by this Court.

Respectfully submitted,

/s/ Christina R.B. López

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**CERTIFICATE OF SERVICE**

I certify that true and exact copies of the foregoing have been served via electronic and U.S. Mail on June 15th, 2020 on the following:

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